

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ASHLEY JEAN ARNOLD
a/k/a Steven Roy Arnold,

Plaintiff,

V.

ERIC D. WILSON, et al.,

Defendants.

Civil Action No. 1:13-cv-900
(LMB/TRJ)

DEFENDANTS' MOTION TO DISMISS AND FOR SUMMARY JUDGMENT

Pursuant to Federal Rules of Civil Procedure 12(b)(6) and 56, defendants Eric D. Wilson, Charles E. Samuels, Jr., Dr. Jorge Vazquez-Velazquez, and Dr. Donald Lewis, in their official and individual capacities, through their undersigned counsel, respectfully move to dismiss the plaintiff's complaint and for summary judgment in their favor. The grounds for this motion are fully explained in the memorandum of law filed with this motion.

Dated: April 11, 2014

Respectfully submitted,

DANA J. BOENTE

ACTING UNITED STATES ATTORNEY

By:

/s/

BENJAMIN T. HICKMAN

Special Assistant U.S. Attorney

Justin W. Williams U.S. Attorney's Building

2100 Jamieson Avenue

Alexandria, Virginia 22314

Telephone: (703) 299-3700

Fax: (703) 299-3983

Email: benjamin.hickman@usdoj.gov

DENNIS C. BARGHAAN, JR.
Assistant U.S. Attorney
Justin W. Williams U.S. Attorney's Building
2100 Jamieson Avenue
Alexandria, Virginia 22314
Telephone: (703) 299-3700
Fax: (703) 299-3983
Email: dennis.barghaan@usdoj.gov

Attorneys for Defendants

Of Counsel: Jennifer Dannels, Attorney
Federal Bureau of Prisons

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2014, I will file the foregoing via CM/ECF and serve the foregoing via U.S. Mail on the following non-filing user:

Ashley Jean Arnold 58434-083
a/k/a Steven Roy Arnold
FCI Petersburg Medium
Federal Correctional Institution
P.O. Box 1000
Petersburg, VA 23804

/s/

BENJAMIN T. HICKMAN
Special Assistant U.S. Attorney
2100 Jamieson Avenue
Alexandria, Virginia 22314
Telephone: (703) 299-3770
Fax: (703) 299-3983
Email: benjamin.hickman@usdoj.gov